of the law had no vested right, contractual or otherwise, to allow it to be used in connection with the maintenance of a bawdy-house after the passage of the act.

Right of Corporations to Practice Law.—A corporation contracted with property owners, agreeing to represent the latter in obtaining awards in condemnation proceedings against New York City and to receive in payment a percentage of the awards. It agreed to pay all expenses, and was to be entitled to allowances, by the court for expenses. A practicing attorney was then employed to appear as attorney of record for the property owners and to conduct the proceedings. He was to receive for his services whatever allowances were made for counsel fees and costs by the condemnation commissioners, and was required to collect for the corporation such percentage of the awards as its contract with the property owners provided for, and pay all expenses for the preparation for trial, the trial of the proceedings, and the collection of the awards, including the expenses for witnesses. He was also required to file with the proper officers a notice of his lien as attorney for the property owners for the amount due for legal services in connection therewith, and not to cancel the lien until the corporation's fees were paid. The Supreme Court of New York at Trial Term in United States Title Guaranty Co. *v.* Brown, 149 New York Supplement, 186, in an action by the corporation against the attorney for an accounting, held that the corporation's contract, construed in connection with its contract with the property owners, was an attempt on its part to practice law, in contravention of public policy and in violation of statute, the court adding: "The profession of the law, one of the oldest known to civilization, involving the most sacred confidence between man and man, with its past of high ideals and service to humanity, has in the last quarter of a century suffered much from the inroads of the new financial and business methods in this great land of ours. Whether by ill-advised attempts by corporate employers to dominate and direct attorneys and counsel in the conduct of litigation, whether by so-called title companies or casualty insurance corporations, the old ideals in the relation of attorney and client, which meant so much to mankind, have suffered and have been threatened with demoralization. This is wrong. The loss of the individual personal relation involved in the attempt by corporations to practice law is so serious to the community that it is against public policy, and I am inclined to think malum in se; but, at any rate, there is no question that in this state it is unlawful by force of the statute. The agreement of the plaintiff and defendant and the plaintiff's agreements with the property owners seem to me to be flagrant violation of the law, and before a court of equity no skillfully

framed wording of a corporate charter can be allowed to cover the wrong or to make them legal."

Sane in one State but Insane in Another.—A case involving the rights of one who had been adjudicated a lunatic in New York, and rivaling the Thaw case in interest from a legal point of view, is to be found in Chaloner *v.* Sherman, 215 Federal Reporter, 867. Chaloner was committed, by the New York Supreme Court, in 1897, on ex parte order, to the Bloomingdale Insane Asylum, and in 1899 was formally adjudged an incompetent and a committee appointed to care for his property. He subsequently escaped to Virginia, and in 1901 was there declared by proceedings in court to be of sound mind. He thereafter brought an action in the United States Circuit Court for recovery of his property from the committee, or to recover damages for its detention. It appears that he was afraid to go to the state of New York to attend the trial for fear he might be summarily seized and reincarcerated in the asylum. He thereupon applied to the federal court for a writ of protection, so that he might attend the trial in the custody of a United States marshal. This was refused by the Circuit Court, but the order was reversed by the Circuit Court of Appeals in 1908; this branch of the case being reporte under the title of Chanler *v.* Sherman, 162 Federal Reporter, 19, and the writ awarded. The more recent decision to which reference is above given is on appeal from a judgment in the District Court entered upon a directed verdict for defendant. All of Chaloner's allegations of irregularity in the insanity adjudication were held without merit, and the decision that he was mentally incompetent not subject to collateral attack. The court suggests that, if he is entitled to any remedy, he should apply to the state court to set aside the adjudication against him on the ground that he is now sane. As to how he shall proceed, and as to whether he will be compelled to risk his liberty entirely to the state authorities, does not appear.